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State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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August 20, 2001

Johnny Pappas, Sr. Environmental Engineer  
Plateau Mining Corporation  
847 Northwest Highway 191  
Helper, Utah 84526

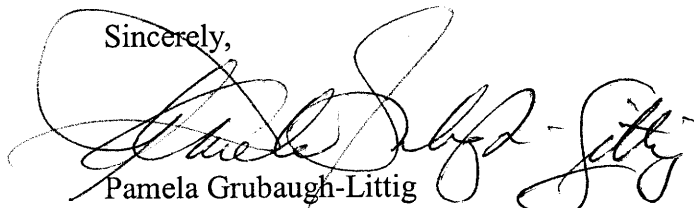
Re: Refuse Pile Use as Waster Fuel by SCA, Plateau Mining Corporation, Star Point Mine,  
0007/006-AM01C, Outgoing File

Dear Mr. Pappas:

The above-referenced amendment has been reviewed. There is a deficiency that must be adequately addressed prior to approval. A copy of our Technical Analysis is enclosed for your information. In order for us to continue to process your application, please respond to this deficiency by November 10, 2001.

If you have any questions, please call me at (801) 538-5268 or Karl Houskeeper at (435) 613-5330.

Sincerely,



Pamela Grubaugh-Littig  
Permit Supervisor

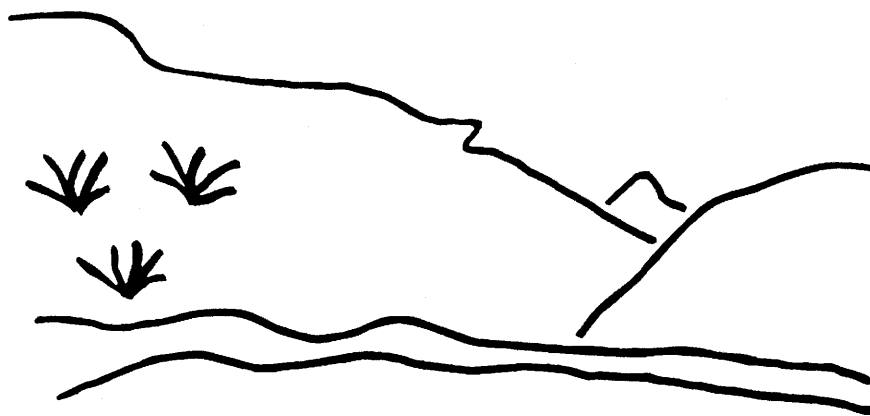
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Enclosure

cc: Price Field Office

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# State of Utah



## Utah Oil Gas and Mining

### Coal Regulatory Program

Star Point Mine  
C/007/006-AM01C  
Technical Analysis  
August 8, 2001

INTRODUCTION

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## TECHNICAL ANALYSIS

### INTRODUCTION

On August 8, 2001, the Division reviewed the amendment submitted by Plateau Mining Corporation (PMC) relative to the Star Point Mine. The amendment material submitted contains clarifications and removal of inconsequential information due to the current status of the Star Point and Willow Creek Mines. Star Point has begun the reclamation process and Willow Creek is in temporary cessation of operations.

PMC's current MRP allowed for the removal, processing, and transporting of the refuse material.

The amendment addresses Refuse Pile Use as Waste Fuel Resources by Sunnyside Cogeneration Facility. Sunnyside Cogeneration Associates (SCA) has evaluated the waste as a fuel resource and has asked PMC to amend its MRP to allow the refuse material to be moved to SCA's permitted facility.

As indicated on PMC's cover letter PMC and SCA are considering under-taking permitting actions that would ultimately transfer the refuse pile responsibility from PMC to SCA.

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August 8, 2001

## INTRODUCTION

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SUMMARY OF OUTSTANDING DEFICIENCIES

## SUMMARY OF DEFICIENCIES

*The Technical Analysis of the proposed permit changes cannot be completed at this time. Additional information is requested of the permittee to address deficiencies in the proposal. A summary of deficiencies is provided below. Additional comments and concerns may also be found within the analysis and findings made in this Draft Technical Analysis. Upon finalization of this review, any deficiencies will be evaluated for compliance with the regulatory requirements. Such deficiencies may be conditioned to the requirements of the permit issued by the Division, result in denial of the proposed permit changes, or may result in other executive or enforcement action as deemed necessary by the Division at that time to achieve compliance with the Utah Coal Regulatory Program.*

*Accordingly, the permittee must address those deficiencies as found within this Draft Technical Analysis and provide the following, prior to approval, in accordance with the requirements of:*

### *Regulations*

**R645-301-528.322** – Maintenance, inspections, and records of materials should be maintained by the operator and information submitted to the District Manager of MSHA every twelfth month. .... 6

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August 8, 2001

**SUMMARY OF OUTSTANDING DEFICIENCIES**

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## OPERATION PLAN

# OPERATION PLAN

## SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

### Minimum Regulatory Requirements:

Refuse piles shall meet the requirements of coal mine waste, the additional requirements provided below and the requirements of 30 CFR Sections 77.214 and 77.215.

If the disposal area contains springs, natural or manmade water courses, or wet-weather seeps, the design shall include diversions and underdrains as necessary to control erosion, prevent water infiltration into the disposal facility, and ensure stability. Uncontrolled surface drainage may not be diverted over the outslope of the refuse pile. Runoff from areas above the refuse pile and runoff from the surface of the refuse pile shall be diverted into stabilized diversion channels designed to safely pass the runoff from a 100-year, 6-hour precipitation event. Runoff diverted from undisturbed areas need not be commingled with runoff from the surface of the refuse pile.

Underdrains shall comply with the general requirements for the disposal of excess spoil.

Slope protection shall be provided to minimize surface erosion at the site. All disturbed areas, including diversion channels that are not ripped or otherwise protected, shall be revegetated upon completion of construction.

All vegetative and organic materials shall be removed from the disposal area prior to placement of coal mine waste. Topsoil shall be removed, segregated and stored or redistributed. If approved by the Division, organic material may be used as mulch or may be included in the topsoil to control erosion, promote growth of vegetation, or increase the moisture retention of the soil.

The final configuration of the refuse pile shall be suitable for the approved postmining land use. Terraces may be constructed on the outslope of the refuse pile if required for stability, control of erosion, conservation of soil moisture, or facilitation of the approved postmining land use. The grade of the outslope between terrace benches shall not be steeper than 2h:1v (50 percent).

No permanent impoundments shall be allowed on the completed refuse pile. Small depressions may be allowed by the Division if they are needed to retain moisture, minimize erosion, create and enhance wildlife habitat, or assist revegetation, and if they are not incompatible with the stability of the refuse pile.

Following final grading of the refuse pile, the coal mine waste shall be covered with a minimum of 4 feet of the best available, nontoxic and noncombustible material, in a manner that does not impede drainage from the underdrains. The Division may allow less than 4 feet of cover material based on physical and chemical analyses which show that the revegetation requirements will be met.

A qualified registered professional engineer, or other qualified professional specialist under the direction of the professional engineer, shall inspect the refuse pile during construction. The professional engineer or specialist shall be experienced in the construction of similar earth and waste structures. Such inspection shall be made at least quarterly throughout construction and during critical construction periods. Critical construction periods shall include, at a minimum: Foundation preparation including the removal of all organic material and topsoil; Placement of underdrains and protective filter systems; Installation of final surface drainage systems; and, The final graded and revegetated facility. Regular inspections by the engineer or specialist shall also be conducted during placement and compaction of coal mine waste materials. More frequent inspections shall be conducted if a

## OPERATION PLAN

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danger of harm exists to the public health and safety or the environment. Inspections shall continue until the refuse pile has been finally graded and revegetated or until a later time as required by the Division.

The qualified registered professional engineer shall provide a certified report to the Division promptly after each inspection that the refuse pile has been constructed and maintained as designed and in accordance with the approved plan and this Chapter. The report shall include appearances of instability, structural weakness, and other hazardous conditions. The certified report on the drainage system and protective filters shall include color photographs taken during and after construction, but before underdrains are covered with coal mine waste. If the underdrain system is constructed in phases, each phase shall be certified separately. The photographs accompanying each certified report shall be taken in adequate size and number with enough terrain or other physical features of the site shown to provide a relative scale to the photographs and to specifically and clearly identify the site. A copy of each inspection report shall be retained at or near the minesite.

### Analysis:

#### Refuse piles

Pages 500-11, 500-12, 500-52 & 500-55 have been submitted for change to the MRP.

Page 500-11 clarifies the type of equipment to be used.

Page 500-12 states that tonnage records of refuse removed will be maintained by SCA. This page should be modified to indicate that a copy of this information is maintained by PMC since they are the current permit holder for the refuse pile. Information is provided to indicate that the refuse material will be used as fuel source for SCA (C/007/035) and removes information regarding the transportation and processing by PMC.

Page 500-52 removes information from the MRP on reprocessing the refuse pile by PMC.

Page 500-55 defines the refuse pile as waste fuel instead of coal.

### Findings:

The information is clear and concise clarifying the equipment used and the use of the refuse material as a fuel source by SCA. However, page 500-12 should be modified to indicate that the tonnage records of refuse removed should be kept on file by PMC, since they are the present holder of the MRP for the refuse pile, see **R645-301-528.322**.

**R645-301-528.322** – Maintenance, inspections, and records of materials should be maintained by the operator and information submitted to the District Manager of MSHA every twelfth month.